

Application No. 10/786,777

Attorney Docket No. 213187-00008

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REMARKS

Upon entry of the Amendment, Claims 1-5, 11 and 12 are pending. Claim 1 has been amended to more particularly point out the invention. Claim 1 has been amended to clarify the invention. Dependent claims 11 and 12 have been added. The Examiner is respectfully reminded that a Petition to Make Special has been granted in this case. It is respectfully submitted that upon entry of the amendment and consideration of the remarks below that the application is in condition for allowance.

CLAIM REJECTIONS - 35 U.S.C. § 103

Claim 1 has been rejected under 35 U.S.C. 103(a) as being unpatentable over Rangan, et al., U.S. Patent No. 6,198,833 ("the Rangan et al patent") in view of Rhoads US Patent No. 6,411,725 ("the Rhoads patent"). It is respectfully submitted that neither the Rangan, et al. patent nor the Rhoads patent disclose or suggest the invention as recited in the claims at issue. The Applicant agrees that "Rangan fails to explicitly teach said video linking system generating one or more linked video files separate from said video content being configured to identify the pixel objects by frame number and location with the frame. " (Office Action Page 5, line 22-Page 6, line 2) . The Applicant also agrees that "Rangan fails to explicitly teach video files played back independently while said video content is played back." (Office Action Page 6, lines 13-15.). Indeed , the Rangan et al patent teaches the use of embedding pixel object data in the video content as hyperlinks.(*" The overall purpose of the authoring station is addition of innovative material to the video data stream..."* Rangan et al patent, Col. 5, lines 20-21. Also, the title of the Rangan et al patent is "Enhanced Interactive Video With Object Tracking and Hyperlinking") As is well known in the art hyperlinks are embedded in the video content. Page 6 Of the Official Action states that the Rhoads patent teaches independent linked video files citing Col. 7, lines 9-25 of the Rhoads et al patent. The cited passage teaches independent playback of "watermark" data that is embedded in the video content signal. More particularly, it is respectfully submitted that the cited passage as well as the entire Rhoads patent teaches a system

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in which the pixel object information is embedded in the video content; contrary to the invention. ("Consider an example where a watermark encoder encodes a short title (or number) and location of marked video objects *into the video stream* containing these objects." Rhoads et al patent Col. 7, lines 11-13. "The embedding process encodes one or more watermarks into frames of a video sequence..." Rhoads et al patent, Col 5, lines 53-54. Claim 1 of the Rhoads et al patent recites in part; " "steganographically encoding object specific information about the video object *into the video signal*") The claims recite a system in which the pixel object data is separate from and not embedded in the video content, which is not suggested or disclosed by either the Rangan et al patent or the Rhoads patent. In fact these patents actually teach away from such a system as recited in the claims.

The invention recited in the claims at issue provides a distinct advantage over the systems disclosed in both the Rangan et al and Rhoads patents; namely, the invention does not require modification of the original video content. The systems taught by the Rangan et al and Rhoads patent embed the pixel content information into the video content. Copyright owners of various video content are thus required to not only provide permission for playback of copyrighted video content but must also provide permission to modify the original video content which will unlikely be granted for fear by the copyright owners of detracting from the quality of the video content. The systems disclosed in the Rangan et al and Rhoads patents would require modification of the original video content to embed the pixel object information. The system recited in the claims at issue would not require modification of the original video content since the pixel object information is not embedded in the video content. For these reasons the Examiner is respectfully requested to reconsider and withdraw the rejection of claim 1.

Claims 2 and 3 were rejected under 35 USC § 103 as being unpatentable over the Rangan et al and Rhoads patent and further in view of Vidovic US Patent No. 3,878,557 ("the Vidovic patent"). Claims 2 and 3 are dependent upon claim 1. The Rangan et al and Rhoads patents were discussed above. The Vidovic patent was cited for disclosing a videotape recording apparatus

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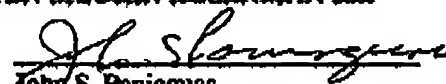
that samples at a sample rate less than the playback rate. The Vidovic patent does not otherwise disclose or suggest a system for generating linked video files regarding pixel objects that is not embedded in the video content. As mentioned above, the Vidovic patent relates to a video recorder and has nothing to do with an image processing device as recited in the claims at issue. For these reasons and all of the above reasons, the Examiner is respectfully requested to reconsider and withdraw the rejection of these claims.

Claims 4 and 5 were rejected under 35 USC § 103 as being unpatentable over the Rangan et al and Rhoads patent and further in view of Toklu US Patent No. 6,549,643 ("the Toklu patent"). Claims 2 and 3 are dependent upon claim 1. The Rangan et al and Rhoads patents were discussed above. The Toklu patent was cited for allegedly disclosing a system for identifying segment breaks in a video sequence. The Toklu patent does not otherwise disclose or suggest a system for generating linked video files regarding pixel objects that is not embedded in the video content. For these reasons and all of the above reasons, the Examiner is respectfully requested to reconsider and withdraw the rejection of these claims.

Respectfully submitted,

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